

Voytilla, Marykay

From: Voytilla, Marykay
Sent: Thursday, March 13, 2014 1:25 PM
To: Boykin, Michael; Greaves, Natasha; Clark, Johnny
Cc: Maxwell, Grady; Hendrickson, Andrew; Filippini, Mark; Mills, Joann; Allamano, Jonell; Hamlin, Tim; Chu, Ed
Subject: Indoor Air Quality Data
Attachments: LEEDConstructionIAQPlanPost Occupancy.pdf; Project Manual - IAQ Section.pdf
Categories: Weekly Const. Updates

Mike, Natasha and Johnny,

I want to close the loop with you on indoor air quality (IAQ) sampling data. I appreciate and share the Union's interest in ensuring the health and safety of Region 10 employees and in making data available as appropriate to satisfy information requests.

I will continue to add IAQ sampling data to the OneDrive (formerly SkyDrive) for you to access. Recently, I posted the results for floor 21 indicating that all measured constituents have met the LEED requirements. As a result we have scheduled the move of staff to floor 21 along with the opening of the regional conference center. Office contents and IT/AV equipment will be moved to floor 21 on March 20 and 21. Staff will occupy their new spaces on floor 21 on March 24. The new regional conference center will also open on March 24.

As you know, floor 21 was vented with outside air and sampled/re-sampled a number of times before the allowable limits for total volatile organic compounds (TVOC) were achieved. The limits for the other measured constituents were achieved earlier. The final report for floor 21, which is posted to the OneDrive, shows TVOCs at <200 ug/cubic meter – well below the LEED maximum allowable level of 500 ug/cubic meter.

I have consulted with our GSA project manager regarding sharing detailed IAQ reporting data with the broad EPA audience (i.e., posting to the web). I have also discussed this issue with Mark Filippini. GSA recommends against broad posting of the data. The data does not belong to EPA. We do not have control over the reporting measures nor the contractors collecting/analyzing the data. The requirements are specified in the contract per LEED and are further defined in the e-mail below and the attachments to this message. The data has been reviewed by both EPA's LEED consultant and GSA's Industrial Hygienist. Both are satisfied that the LEED contractual requirements have been met.

Mike, as we discussed previously, please feel free to share the e-mail below and the attachments to this message with staff who have questions about the indoor air quality data, sampling approach, limits, analytes, etc. In addition, Mark and I are okay if you share the results in the reports in the OneDrive with individual staff on a need-to-know basis. However, I ask that you please refrain from posting or broadly distributing the OneDrive data reports. This will help us abide by the recommendation of our GSA partner while ensuring that staff with legitimate concerns get their information needs met.

Both Mark and I are available for further discussion. Thanks.

Mary Kay Voytilla

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From: Voytilla, Marykay
Sent: Tuesday, March 04, 2014 1:51 PM
To: Boykin, Michael
Cc: Greaves, Natasha; Clark, Johnny; Maxwell, Grady; Hendrickson, Andrew; Filippini, Mark; Mills, Joann; Allamano, Jonell; Hamlin, Tim; Chu, Ed; James Truhan - 10PCE; William Senn - 10SPSP; mary.senn@gsa.gov; Coon, Duane; Berlow, Cathy
Subject: Response to Union on Remodel Air Quality Data

Hi Mike,

I am in agreement with the information that you provide below. The remodel team members have placed a high premium on working collaboratively with staff, management and Union representatives to achieve the build-out of our new space. We intend to continue to do so.

After we met, I arranged a meeting with Grady, Mark, Jonell and our GSA representative, Jim Truhan, to discuss this matter further. Since the lease is between GSA and the Lessor (Washington Holdings), not EPA, release of the data must be sanctioned by GSA. GSA had previously agreed to our making the data available to a limited group including Union reps, after which I set up the skydrive and have added data as it become available. We received an initial response from GSA late last week in which they did not endorse broadly publishing indoor air quality (IAQ) sample results for general access. Mark Filippini and I are meeting with our GSA rep again this week to discuss further.

In the meantime, we are awaiting the receipt of additional sample results from the Lessor for the 21st floor. As you know, the 21st floor has failed several times the 500 micrograms/cubic meter TVOC allowable limit for LEED before occupancy. The Lessor and their contractors believe that this is due to the high ceilings on that floor and the resulting increased air volume that must be flushed (i.e., taking more time to flush the space).

While we continue to discuss the broad release of IAQ data with GSA, I can provide you with some additional information by way of this e-mail that you should feel free to share with concerned staff. I appreciate your diligence to hold sample documentation closely while we work this issue with

GSA. However, I do think it's fine for you to **discuss** the results with staff since we were given the green light to share the data with you.

- I am attaching the relevant section (IEQ Credit 3.2) of the *2009 LEED Reference Guide for Green Interior Design and Construction*. This will describe the LEED requirement for an IAQ management plan and pre-occupant contaminant maximum concentration levels that must be demonstrated in order to achieve this LEED credit.
- I'm also attaching the *Indoor Air Quality Requirements* for our project being employed by the Lessor's contractors pursuant to our lease.
- Please follow this link to a document posted to the Park Place Remodel website: [Health & Safety Issues of Concern During Building Renovation](#). This document was jointly developed by move team members, GSA, Union and H&S staff to address anticipated health and safety questions. A number of the questions address air quality issues including 1, 2, 3, 10, 14, and 18.
- Lastly, below, I'm including a summary write-up from EPA's LEED consultant, Rebecca Aarons-Sydnor. She is with Sustainable Design Consulting in Richmond, VA and is on contract to HQ's Office of Administration and Resources Management (OARM). Rebecca provides LEED expertise to OARM for EPA remodel projects.

Mike, I think that these resources should address the EPA staff questions you note in your e-mail below.

What is LEED indoor air quality (IAQ) testing method?

The IAQ sampling methodology that LEED uses today evolved from the EPA Research Triangle Park project, prior to LEED, and actually informed the development of LEED. The methodology LEED accepts is based on either the EPA Compendium of Methods for the Determination of Air Pollutants in Indoor Air (based on the RTP with improvements) or ISO testing methods (the methods are 16000-3, 7708, 16000-6, and 4224). Both methods require taking a test during normal operating hours under normal HVAC conditions. The test lasts for 4 hours, and must be taken in a space that is considered representative (or worst case, if spaces are diverse) of those served within the sample area. The sample area must be no more than 1 floor, and served by no more than one ventilation system.

What are acceptable limits for LEED IAQ test method?

The limits applied to the various contaminants are based on "recognized acceptable levels." While there is no proof that any limit will guarantee no adverse reactions for all people, research over the past 20 years on the contaminants and their health impacts informs these limits. These tests provide reassurance that the contaminants are at an acceptable limit upon move in, with the recognition that many concentrations will continue to fall as the various building materials are depleted of their contaminants (finish off-gassing) and as the contaminants are captured and permanently removed from the space by the HVAC filters and regular cleaning.

What is tested by the LEED IAQ method?

Particulates are minute airborne particles which may include lint, dirt, dust, bacteria, pollen, dander, etc. These can exacerbate respiratory problems if present in large quantities. Thus we are testing for them, and we are requiring high filtration (the MERV 13 filters) for all outside air during construction.

VOCs are the “new smell” which can cause nausea, headaches or other ailments when present in large concentrations. LEED imposes various VOC limits in paints, adhesives, sealants, etc. These limits are based on Green Seal and South Coast Air Quality Management District (SCAQMD) regulations.

Green Seal is an independent non-profit ANSI standards developer. SCAQMD is a government entity tasked with improving air quality. The Lease imposes more stringent limits on all of these products. The lease also imposes formaldehyde emission limits on wood and insulation products.

What other safeguards are taken for LEED IAQ testing?

EPA purchased new furniture that is Greenguard certified. The Greenguard Environmental Institute is an independent, non-profit, third-party ANSI standard developer. Greenguard requires annual recertification, constant quality monitoring, and utilizes established government and industry programs in its certifications. The Greenguard Certification program encompasses testing 350 individual VOCs, with stringent health-based emissions limits. Greenguard performs chamber tests. Products are received in standard packaging and are placed in the air-tight testing chamber within 1 hour of removing packaging. They remain in the chamber for 48 hours, and then the air within the chamber is tested for contaminants. There is typically a steep emissions curve, in which VOCs escape rapidly in the beginning, and then the rate drops off. The vast majority of VOCs are emitted during this 48 hr period.

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From: Boykin, Michael
Sent: Monday, March 03, 2014 4:46 PM
To: Voytilla, Marykay
Cc: Greaves, Natasha; Clark, Johnny; Maxwell, Grady; Hendrickson, Andrew; Filippini, Mark
Subject: Remodel Air Quality Data

Hi Marykay!

I am emailing to document what we discussed in our face to face meeting and in subsequent email/voicemail messages.

Based on requests made by some of the Union's Bargaining Unit Employees (BUEs) for air quality data for the floors they were moving to, I spoke with you two weeks ago. Subsequent to our conversation, you emailed me a link to a SkyDrive, where the latest available data for air samples collected from the 20th floor were posted. Thank you for arranging for access to the data. Since that time, I have noticed more data has been posted for the 17th floor.

Last week I was approached by several more BUEs who were very concerned about how the air samples were collected, what parameters are being analyzed for, and what are the health criteria/standards indicating that it is safe to move in. It has come to the Union's attention that a couple of the BUEs were exposed to conditions,

after a previous remodel, that resulted in them becoming sick and sensitized to the air contaminants, requiring many weeks of recovery. As you probably understand and can empathize, any hint of a repeat of that previous exposure situation, is causing grave concerns about the presence of contaminants and a reoccurrence of their illnesses.

While I have access to the data that you arranged for, I don't feel it is appropriate for me to distribute it, hence, the rationale behind my request that EPA, GSA and the property manager post the air quality data on the InfoPage or another appropriate location. Posting the data on a regular basis will increase transparency and allow unfettered access for all EPA R10 personnel to make more informed decisions about their health risk before and after their move. You indicated to me that you would check with GSA and the property manager to determine if it can be arranged.

Thank you for your attention to this matter and consideration of our request.

Sincerely,

Mike

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